Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 12-25 are pending in the application, with claims 12, 24, and 25 being the independent claims. Claims 1-11 are sought to be cancelled without prejudice to or disclaimer of the subject matter therein. Applicants reserve the right to prosecute similar or broader claims, with respect to the cancelled claims, in the future. New claims 12-25 are sought to be added. Support for the new claims can be found, for example, throughout the originally filed specification, figures, and claims, and more particularly, for example, at pages 7-9 and in Figures 3a and 6.

The specification and figures are sought to be amended, as noted above, for clarification and to correct for typographical errors.

These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejection under 35 U.S.C. § 112

Claims 1-8 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter. Applicants respectfully disagree and traverse.

Applicants believe the previously pending claims all complied with the requirements of 35 U.S.C. § 112. However, without acquiescing to the propriety of the rejection, Applicants have canceled claims 1-8, rendering the rejection moot.

Rejection under 35 U.S.C. § 103

Claims 1-11 were rejected under U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,421,768 to Purpura ("Purpura") in view of either U.S. Patent No. 6,226,752 to Gupta *et al.* ("Gupta") or U.S. Patent No. 6,047,268 to Bartoli *et al.* ("Bartoli") and either U.S. Patent No. 6,311,269 to Luckenbaugh *et al.* ("Luckenbaugh") or U.S. Patent No. 6,275,934 to Novicov *et al.* ("Novicov"). Applicants respectfully disagree and traverse.

While Applicants believe there are patentable differences between previously pending claims 1-11 and the applied references, and without acquiescing to the propriety of the rejection, Applicants have canceled claims 1-11, rendering the rejection moot.

New Claims

New independent claim 12 recites a method comprising:

> registering a first site and at least one second site with an information utility;
> storing site-specific information for the first site and the at least one second site at the information utility;
> receiving a request from the first site at the information utility;
> transforming the request from the first site into a format compatible with a preferred one of the at least one second site using the information utility; and
> transmitting the transformed request to the preferred one of the at least one second site,

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wherein relationship between the first site and the
preferred one of the at least one second site is anonymous.

Applicants assert that, either alone or in combination, Purpura, Gupta, Bartoli,
Luckenbaugh, and Novicov do not teach or suggest each and every feature of claims 12,
24, and 25. For example, the combination of Purpura, Gupta, Bartoli, Luckenbaugh, and
Novicov does not teach or suggest "*registering a first site and at least one second site
with an information utility; storing site-specific information for the first site and the at
least one second site at the information utility; transmitting the transformed request to
the preferred one of the at least one second site, wherein relationship between the first
site and the preferred one of the at least one second site is anonymous,*" as recited in
claims 1, 24, and 25, using respective language.

Purpura discloses cryptographically assured data structures to enable a single sign
on and/or authentication method for securely transferring user authentication information
from a first computer to a second computer (Purpura Abstract). Thus, if a second
computer in the system of Purpura *trusts* the methods used by a first computer to
authenticate a user, then the second computer can use a cryptographically assured cookie
created by the first computer to authenticate the user (Purpura Abstract). In the method
of Purpura, *the second computer must be able to authenticate the first computer* in
order to use the first computer's cryptographic assurance (Purpura Col. 5, Lines 46-52).
In contrast, claims 12, 24, and 25 recite, using respective language, *wherein relationship
between the first site and the preferred one of the at least one second site is anonymous.*
Moreover, Applicants assert that Purpura does not teach or suggest *registering a first site
and at least one second site with an information utility; storing site-specific information*

for the first site and the at least one second site at the information utility, as recited in claims 12, 24, and 25, using respective language.

Gupta is directed to a method and apparatus for authenticating users. A client may communicate with an application server. However, prior to providing information from the application server to the client, the application server may require that the client authenticate itself to a login server. Once authenticated, the application server may communicate directly with the login server to verify the authentication. After verification is complete, the application server may provide the client with any requested information (Gupta Col. 11, Lines 25-37). In the method of Gupta, applications on the application server need not to be concerned about authenticating a given user. The *application server* merely *needs to know how to work* with the *login server* to authenticate the user (Gupta Col. 7, Lines 16-19). Therefore, the method and apparatus disclosed by Gupta does not teach or suggest *wherein relationship between the first site and the preferred one of the at least one second site is anonymous,* as recited in claims 12, 24, and 25, using respective language. In contrast, the application server of Gupta needs to know how to work with the login server.

Bartoli discloses a method and apparatus for authenticating transactions accomplished over data network utilizing a cookie (Bartoli Abstract). In the system of Bartoli, a *subscribing user* has *registered* with a *provider of the billing system*. Also in Bartoli's system, a *merchant* has made previous *arrangements* with the *provider of the billing system* (Bartoli Col. 2, Lines 27-30). Therefore, in the system of Bartoli, the user is registered with the provider of the billing system and also the provider of the billing system and the merchant are known to each other (as they have made previous

arrangements). This is in contrast to at least *"wherein relationship between the first site and the preferred one of the at least one second site is anonymous,"* as recited in claims 12, 24, and 25, using respective language.

Luckenbaugh discloses a method and apparatus for limiting access to information stored in a resource of a data processor network. In the method of Luckenbaugh, user identity and credentials are mapped with randomly assigned security cookie information, which serves as a surrogate credential accompanying each user request during a session (Luckenbaugh Abstract). A user uses a web browser to access a web server. The method of Luckenbaugh limits access to information stored in HTML files accessible by the web server. Therefore, nothing in Luckenbaugh teaches or suggests transmitting a request from a first site to a preferred one of the at least one second site *wherein relationship between the first site and the preferred one of the at least one second site is anonymous,* as recited in claims 12, 24, and 25, using respective language.

Novicov discloses a method and apparatus for authenticating an information exchange between a host and a guest on a network. In this method, the host has a host key and the guest has a guest key. The **guest authenticates** the **authenticating server** using the guest key. The **host authenticates** the **guest** and the **authenticating server** using the host key (Novicov Abstract). Therefore, in the method of Novicov, both the guest and the host authenticate the authenticating server and also the host authenticates the guest. This is in contrast to *"wherein relationship between the first site and the preferred one of the at least one second site is anonymous,"* as recited in claims 12, 24, and 25, using respective language.

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Therefore, for at least the reasons set forth above, Applicants submit that independent claims 12, 24, and 25 are patentable over Purpura, Gupta, Bartoli, Luckenbaugh, and Novicov, either alone or in any allegedly obvious combination.

Claims 12-23, which depend from independent claim 12, are also patentable over the Purpura, Gupta, Bartoli, Luckenbaugh, and Novicov for reasons similar to those set forth above with respect to independent claim 12, and further in view of their own respective features.

Accordingly, Applicants respectfully request that the Examiner find claims 12-25 allowable.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.
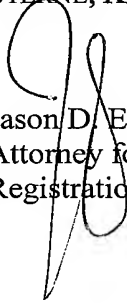
Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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